

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY**

LD MANAGEMENT LLC AND MICHAEL
LUKACS,

Plaintiffs,

vs.

FIRST REPUBLIC BANK, INC.

Defendant.

Case No. 2:21-cv-18427-KM-JSA

**CERTIFICATION OF
MARTIN GIBSON**

I, Martin Gibson, of full age, hereby certify as follows:

1. I am the Senior Vice President for Deposit Strategy and PWM Banking Partnerships, at First Republic Bank (“First Republic”). I have held this position since 2020.

2. I am authorized to make this certification on behalf of First Republic in relation to the above-captioned matter. If called upon to do so, I could and would competently testify to the facts contained herein.

3. I make this Certification to supplement the Certification of Fatema Arande, which she signed on behalf of First Republic in connection with this litigation on December 20, 2021.

4. I have access to First Republic’s business records relating to deposit accounts with First Republic. These records, including the documents referenced herein and attached hereto: (i) were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of and a business duty to record or transmit those matters; (ii) are kept in the course of the regularly conducted activity; (iii) were made in the course of regularly conducted activity as a regular practice; and (iv) are routinely relied upon by First Republic in the course of regularly conducted activity. The matters set forth in this certification are based on my personal knowledge and/or these business records.

5. Further, as part of my job responsibilities, I am familiar with the type of account agreements maintained by First Republic for customer accounts.

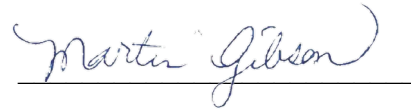
6. I have personally reviewed the relevant account agreements of First Republic as they pertain to the above-captioned matter and to each of the accounts owned by Plaintiffs Michael Lukacs and LD Management, LLC. I rely upon those business records for my knowledge as to the matters to which I am certifying.

7. In connection with Plaintiff Michael Lukacs opening deposit accounts with First Republic, attached as **Exhibit E** and **Exhibit F** are true and correct copies of the Consumer Master Signature Card and Agreement to Open Account(s) covering Michael Lukacs' accounts ending in -016 and -338, respectively. These documents are maintained in First Republic's business records, and I am fully familiar with how these business records are generated, maintained, and routinely relied upon in the ordinary course of First Republic's operations. Each of these documents have been redacted to protect personal identifying information.

8. In connection with Plaintiff LD Management LLC opening a deposit account with First Republic, attached as **Exhibit G** is a true and correct copy of the Business Master Signature Card Resolution and Agreement to Open Accounts and Services covering LD Management LLC's account ending in -239. This document is maintained in First Republic's business records, and I am fully familiar with how this business record is generated, maintained, and routinely relied upon in the ordinary course of First Republic's operations. This document has been redacted to protect personal identifying information.

* * *

I certify under penalty of perjury that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

A handwritten signature in cursive script, reading "Martin Gibson", is written above a horizontal line.

Dated: March 14, 2022